

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ALLAN CHIOCCA,)	
)	
PLAINTIFF,)	
)	
V.)	
)	
THE TOWN OF ROCKLAND, DEIRDRE)	C.A. No. 1:19-cv-10482-WGY
HALL, EDWARD KIMBALL, LARRY)	
RYAN, MICHAEL MULLEN, JR.,)	
MICHAEL O'LOUGHLIN, RICHARD)	
PENNEY AND KARA NYMAN)	
)	
DEFENDANTS.)	
)	

**PLAINTIFF AND COUNTERCLAIM DEFENDANT ALLAN CHIOCCA'S
UNOPPOSED MOTION TO FILE DOCUMENTS AND RELATED PORTIONS OF ITS
PLEADINGS CONCERNING REGINA RYAN'S MAY 21, 2019 REPORT UNDER SEAL**

Pursuant to Local Rule 7.1, Plaintiff and Counterclaim Defendant Allan Chiocca respectfully moves for leave to file all documents and related portions of pleadings concerning Regina Ryan's May 21, 2019 Report under seal. Defendant and Counterclaim Plaintiff Deidre Hall has designated these documents as confidential, pursuant to a Stipulation and Protective Order entered by the court in this case, Docket No. 96. The pages should be impounded until further Order of this Court. The other parties do not oppose this request.

WHEREFORE, for the foregoing reasons, Plaintiff and Counterclaim Defendant Chiocca should be granted leave to file the two deposition pages under seal, and the Court should grant such other and further relief as is just and necessary.

Respectfully submitted,

Allan Chiocca

By his attorney,

/s/ Adam J. Shafran

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Dated: November 12, 2021

LOCAL RULE 7.1(A)(2) CERTIFICATION

I, Samantha C. Halem, certify that I met and conferred with counsel for all parties in a good faith attempt to narrow or resolve the issues raised in this motion. Counsel for Defendant and Counterclaim Plaintiff Deidre Hall, Neerja Sharma, informed us that these documents contained confidential information and that they should be filed under seal in accordance with the Protective Order. Accordingly, I asked for and received consent to this motion to file under seal from all parties.

/s/ Samantha C. Halem

Samantha C. Halem

CERTIFICATE OF SERVICE

I, Samantha C. Halem, hereby certify that on this day a true copy of the above document was served on counsel for all parties through the Court's ECF/CM system.

/s/ Samantha C. Halem

Samantha C. Halem